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8 Attorneys for Defendants
9 HAROLD CARTER, RAYMOND LOERA,
COUNTY OF IMPERIAL, AND IMPERIAL
10 COUNTY SHERIFF'S DEPARTMENT

11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA
13

14 ADRIANA FERNANDEZ,
15 Plaintiff,

16 v.

17 JAMES RAY MORRIS, HAROLD
18 CARTER, RAYMOND LOERA,
COUNTY OF IMPERIAL, IMPERIAL
19 COUNTY SHERIFF'S DEPARTMENT,
and DOES 1-100, inclusive,
20 Defendants.
21

Case No. 08-cv-601-H (PCL)

**JOINT MOTION AND STIPULATION TO
EXTEND PLAINTIFF'S AND
DEFENDANTS' PLEADING DEADLINES**

22 Plaintiff Adriana Fernandez ("Plaintiff") and Defendants County of Imperial, Imperial
23 County Sheriff's Department, Harold Carter, Raymond Loera (collectively "Defendants"), by and
24 through their respective counsel, do hereby jointly move this Court to approve the parties'
25 stipulation as follows:

26 1. On July 16, 2008, this Court granted in part and denied in part the Defendants'
27 Motion to Dismiss Plaintiff's Complaint and, in doing so, granted Plaintiff 30 days from July 16,
28

1 2008 to amend her Complaint. The Court also stated that the parties may request that the
2 Magistrate Judge schedule an early neutral evaluation conference at any time, and ordered the
3 parties to have an early neutral evaluation conference scheduled pursuant to Local Civil Rule
4 16.1(c), if the Defendants filed an Answer.

5 2. On July 22, 2008, this Court granted the parties' "Joint Motion for Extension of
6 Time to Answer". In doing so, the Court extended the Defendants' time to answer Plaintiff's
7 original Complaint to August 25, 2008. The Court also extended the Defendants' time to file a
8 responsive pleading to Plaintiff's Amended Complaint, if she files one, to 20 days from the date
9 the Amended Complaint is filed.

10 3. The parties have agreed to participate in an early neutral evaluation conference,
11 and hereby request that an early neutral evaluation conference be scheduled.

12 4. In the interest of judicial economy and to avoid the time, effort, and expense of
13 preparing pleadings that may be unnecessary following the early neutral evaluation conference,
14 the parties hereby stipulate that Plaintiff's time to file an Amended Complaint shall be extended
15 to 20 days following completion of the early neutral evaluation conference. The parties also
16 stipulate that Defendants' time to file a responsive pleading to Plaintiff's Amended Complaint,
17 shall be extended to 20 days after Plaintiff files her Amended Complaint. In the event Plaintiff
18 chooses not file an Amended Complaint, the Defendants' time to file an Answer to Plaintiff's
19 original Complaint shall be extended to 20 days from the deadline for Plaintiff to file her
20 Amended Complaint.

LIEBERT CASSIDY WHITMORE
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5701 N. West Avenue
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1 Dated: August 11, 2008

Liebert Cassidy Whitmore

2
3 By: _____ /s/

4 Jesse J. Maddox
5 J. Scott Tiedemann
6 Judith S. Islas
7 Attorneys for Defendants
8 HAROLD CARTER, RAYMOND
LOERA, COUNTY OF IMPERIAL, AND
IMPERIAL COUNTY SHERIFF'S
DEPARTMENT

9 Dated: August 11, 2008

Singleton & Associates

10
11 By: _____ /s/

12 Terry Singleton
13 Attorneys for Plaintiff
14 ADRIANA FERNANDEZ

15
16 The parties having agreed and the Court finding good cause thereon,

17 IT IS ORDERED THAT Plaintiff's time to file an Amended Complaint and Defendants'
18 time to file an Answer to Plaintiff's Complaint or a responsive pleading to Plaintiff's Amended
19 Complaint, if one is filed, shall be extended in accordance with the terms set forth above.

20
21 Dated: August ___, 2008

United States Magistrate Judge
Peter C. Lewis

PROOF OF SERVICE BY MAIL

I am a citizen of the United States and employed in Fresno County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 5701 N. West Avenue, Fresno, California 93711. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. On August 11, 2008, I placed with this firm at the above address for deposit with the United States Postal Service a true and correct copy of the within document(s):

**JOINT MOTION AND STIPULATION TO EXTEND
PLAINTIFF'S AND DEFENDANTS' PLEADING DEADLINES**

in a sealed envelope, postage fully paid, addressed as follows:

David J. Zugman
Burcham & Zugman, A.P.C.
964 Fifth Avenue, Suite 300
San Diego, CA 92101

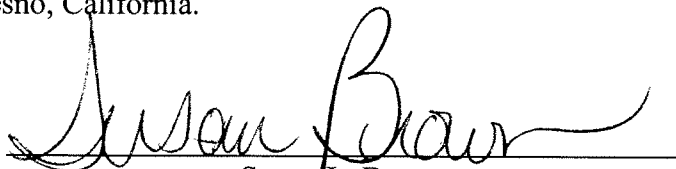
Terry Singleton
Gerald Singleton
Singleton & Associates
1950 Fifth Ave., #200
San Diego, CA 92101

Steven M. Walker
Walker & Driskill, PLC
300 South Imperial Avenue, Suite 9
El Centro, CA 92243

Following ordinary business practices, the envelope was sealed and placed for collection and mailing on this date, and would, in the ordinary course of business, be deposited with the United States Postal Service on this date.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on August 11, 2008, at Fresno, California.


Susan L. Brown